Docket No.: 60468.300301 Patent

# <u>REMARKS</u>

The Examiner is thanked for the comments in the Action. They have helped us considerably in understanding his rationale therein and in drafting this Response thereto.

It is our understanding that claims 1-41 remain pending in this application (wherein claims 17-42 were previously mislabeled). Claims 16-41 have been amended for the reason just noted.

### Item 2, 4, 7-9:

These appear informational in nature and are understood to require no reply.

# Item 1 (Specification):

It is correctly noted that claim 16 is missing and therefore all claims are not in sequence. Responsive thereto, incorrect references "17" through "42" in the claims have been amended to read "16" through "41." We apologize for the inconvenience our inadvertent error has caused.

# Item 3 (§ 102(b)):

Claims 1-15 and 23-36 (now labeled 22-35) are rejected as being anticipated by Baru. The Action states:

Regarding claim 1, Baru teaches a system ... comprising:

a client for ... for authenticating the subject to other components of the system by providing client credentials on behalf of the subject, ... [see Fig. 2 and Sec. 3 on Page 5]; and"

a protocol proxy for communicating between said client and the authentication mechanism and for authenticating said client based on said client credentials, for obtaining from the authentication mechanism temporary credentials for said client to access the server application, and for creating from said temporary credentials an authentication name assertion allowing said client to access the server application [see Secs. 2.8-2.10 on Page 4 and Sec. 3 on Page 5].

Respectfully, this is error. This can be more easily seen by comparing Baru's Fig. 2 (page 5) and Applicant's Fig. 1 when considering these remarks.

Baru teaches a triangular communications path (i.e., like this special character  $\Delta$ ), whereas the presently claimed invention employs a communications path shaped like the letter "T" rotated 90 degrees counter-clockwise (i.e., like this special character  $\vdash$ ).

In Baru the client connects and authenticates to the SRB Master. The SRB Master then "forks" a SRB Agent, i.e., it communicates to it that it is being delegated to service the client when accessed by a connection handle. The SRB Master then provides the connection handle to the client and the client communicates thereafter with the SRB Agent. As can be seen in Baru's Fig. 2, the client, SRB Master, and SRB Agent form the vertexes of its triangle.

Applicant's client communicates with an authentication agent, which does somewhat resemble the client-SRB Master side of Baru's triangle. Next however, our client communicates with a protocol proxy, that in turn communicates with an authentication mechanism. This path is not analogous to any side in Baru's triangle. Our protocol proxy and authentication mechanism do not communicate with our authentication agent, so they cannot be analogized to Baru's SRB Agent. Next, our client communicates with our server application, that being the resource our client seeks access to. However, our server application, communicates only with our client, so this also cannot be analogized to Baru's SRB Agent.

We urge that claims 2-15 and 22-35 (previously labeled 23-36) are allowable for at least the same reasons discussed above for claim 1. Additionally, we submit that many comments in the action regarding claims 2-15 are wrong because the elements being discussed perform different roles and communicate using the noted different paths.

### Item 5 (§ 103(a) 1 of 2):

Claims 17 and 37 (now labeled 16 and 36) are rejected as being unpatentable (obvious) over Baru in view of admitted prior art (APA). Respectfully, this is also error.

We urge that claims 16 and 22-35 (previously labeled 17 and 36) are allowable under an extension of the reasons discussed above for claims 1 and 22. Since Baru does not contribute what it has been relied upon as teaching and since ADA also does not teach this subject matter, the combination of Baru and ADA cannot teach or reasonably suggest the claimed invention here.

#### Item 6 (§ 103(a) 2 of 2):

Claims 18-22 and 38-42 (now labeled 17-21 and 37-41) are rejected as being unpatentable (obvious) over Baru in view of Hele.

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We urge that claims 17-21 and 37-41 (previously labeled 18-22 and 38-42) are also allowable under the same extension of reasons discussed above for claims 1 and 22. Since Baru does not contribute what it has been relied upon as teaching and since Hele also does not teach this subject matter, the combination of Baru and Hele cannot teach or reasonably suggest the claimed invention here.

#### **CONCLUSION**

Applicant has endeavored to put this case into complete condition for allowance. It is thought that the objections have all been corrected by amendment, that the §102 rejections are shown to be unfounded on the prior art references cited, and that the §103 rejections have been completely rebutted. Applicant therefore asks that all objections and rejections now be withdrawn and that allowance of all claims presently in the case be granted.

Intellectual Property Law Offices 1901 S. Bascom Ave., Suite 660 Campbell, CA 95008

Telephone:

408.558.9950

Facsimile:

408.558.9960

E-mail:

RRoberts@iplo.com

Respectfully Submitted,

Raymond E. Roberts Reg. No.: 38,597

Customer No. 32112